

## 1 3.5 Community Resources, Title VI, and Environmental Justice

### 2 3.5.1 Summary of Draft Tier 1 EIS

3 **Community Characteristics and Resources:** Community cohesion impacts were assessed by  
4 evaluating the communities located within the Build Corridor Alternatives and considering how a  
5 new highway would affect that community. The Green Alternative is comprised primarily of new  
6 corridors that would go through or come near Sahuarita, Three Points, Picture Rocks, Avra  
7 Valley, Red Rock, Eloy, Casa Grande, unincorporated western Pinal County, Goodyear,  
8 Buckeye, and Arlington. The Purple Alternative is comprised of a mix of new and existing  
9 highways, with fewer new corridors compared to the Green Alternative, and would go through or  
10 come near Arivaca Junction, Three Points, Picture Rocks, Marana, Casa Grande,  
11 unincorporated western Pinal County, Goodyear, Buckeye, and Arlington. The main differences  
12 between the Purple and Green Alternatives are near the junction of I-11 with I-19 (Arivaca  
13 Junction versus Sahuarita), in central Pinal County (Eloy and Red Rock), and in Buckeye. The  
14 Orange Alternative follows more existing highways than the Purple and Green Alternatives.

15 **Title VI, Environmental Justice, and English Proficiency:** US Census Bureau 2010  
16 Decennial Census data were used to characterize the total population, race, and ethnicity  
17 demographics of the Study Area (US Census Bureau 2010). American Community Survey  
18 5-year estimates for 2011 to 2015 were used to characterize income levels and English  
19 proficiency in the Study Area (US Census Bureau 2015a and 2015b). County-level and  
20 statewide data were collected to provide a regional comparison. Data on both Census Tracts  
21 (CTs) and Census Designated Places (CDPs) were evaluated. CTs are larger geographic  
22 county subdivisions that provide complete coverage of the Study Area and its populations.  
23 CDPs correspond better to the communities and geographies where people live. The  
24 combination of both data points provides complete statistical coverage of the Study Area, with  
25 the CDP data complementing the CT data to provide information on the more densely populated  
26 areas.

27 Comprehensive tables of demographic data are available in Draft Tier 1 EIS **Appendix E5**  
28 (Demographic Data to Support the Title VI, Environmental Justice, and Limited English  
29 Proficiency Analysis). The analysis to determine the potential for disproportionate impacts  
30 followed a more qualitative approach than a project-level environmental justice analysis by  
31 calculating the percentage of the Build Corridor Alternatives that would extend through  
32 communities with a high percentage of low-income and/or minority populations based on  
33 Census data. A threshold of 10 percentage points higher than the county average was used to  
34 determine which areas had a high percentage of low-income and/or minority populations.

35 All three Build Corridor Alternatives have the potential to affect communities whose populations  
36 have a high percentage of low-income and minorities. While many communities in the Study  
37 Area are located along the existing highway facilities, the Orange Alternative passes through the  
38 highest number of low-income and minority communities. While co-location with an existing  
39 highway facility would likely result in fewer right-of-way impacts, expansion of an existing  
40 highway can impact a community in other ways, such as worsening the barrier effect the  
41 highway may have already created between neighborhoods or increasing noise levels and  
42 visibility. This is especially true in Tucson, where the original construction of I-10 in the 1960s  
43 introduced a barrier that divided many of the neighborhoods in downtown Tucson. Expanding

1 I-10 in this area to include an I-11 facility could adversely impact residences and businesses  
2 located very close to the existing I-10 right-of-way.

3 In the southern extents of the Study Area, all three Build Corridor Alternatives follow existing  
4 I-19 near several communities with high low-income and minority percentages, including  
5 Nogales, Rio Rico, Tumacácori-Carmen, Amado, and Arivaca Junction.

6 The Purple and Green Alternatives would generally result in similar overall impacts to minority  
7 and low-income populations, but in different specific locations. In the Eloy and Casa Grande  
8 area, the Green Alternative is a new corridor west of I-10 and the Purple Alternative co-locates  
9 with I-10 and I-8. While the Green Alternative is a new corridor near these communities, south  
10 of I-8 it is located primarily on land that is sparsely developed, agricultural, or undeveloped  
11 desert. The Purple Alternative would also include a new highway on a new alignment near  
12 Goodyear as well as residential and agricultural areas in Buckeye. The Green Alternative avoids  
13 Goodyear and is co-located with SR 85 and I-10 through Buckeye.

14 Potential impacts to tribal communities, which have low-income and minority populations, were  
15 evaluated. The Orange Alternative extends through the Tohono O'odham Nation on a co-  
16 located I-19. I-19 is located on a perpetual transportation easement from the Tohono O'odham  
17 Nation, and any future improvements to accommodate I-11 are assumed to occur within the  
18 existing transportation easement. The Green and Purple Alternatives do not include any tribal  
19 lands. In Pima County, the Green Alternative is farther away from the western boundary of the  
20 Tohono O'odham Nation than the Purple Alternative.

21 Data on limited English proficiency (LEP) were also reported in the Draft Tier 1 EIS. These data  
22 were collected early in the planning process and informed public outreach strategies for the  
23 project. Language groups identified in the Study Area include Spanish, Chinese, and  
24 Vietnamese. FHWA and ADOT identified techniques to address and reduce linguistic, cultural  
25 institutional, geographic, and other barriers to meaningful participation. More detail on specific  
26 outreach techniques can be found in **Chapter 5** (Coordination and Outreach).

### 27 **3.5.2 Summary of Changes Since Draft Tier 1 EIS**

28 Demographic data sources for this Tier 1 EIS were decennial census and American Community  
29 Survey data from the US Census Bureau. These data were not updated or changed. Detailed  
30 tables of demographic data can be found in Draft Tier 1 EIS **Table 3.5-4** and **Table 3.5-5**, as  
31 well as Draft Tier 1 EIS **Appendix E5** (Demographic Data to Support the Title VI, Environmental  
32 Justice, and Limited English Proficiency Analysis).

33 **Agency Comments:** Comments on environmental justice were received from USFS and  
34 Reclamation. USFS expressed concern that the figures and analyses were inconsistent in the  
35 way they addressed impacts to tribal lands. Census Tract data inventorying all tribal lands in the  
36 study area were collected and included in the analysis and are listed in Draft Tier 1 EIS  
37 **Appendix E5** (Demographic Data to Support the Title VI, Environmental Justice, and Limited  
38 English Proficiency Analysis). While the color and shading of the tribal lands layer in the Draft  
39 Tier 1 EIS figures were inconsistent, these inconsistencies were limited to the mapping and  
40 were not substantive to the analysis or decision-making process.

1 Reclamation expressed concern that the discussion of mitigation strategies throughout Draft  
2 Tier 1 EIS **Section 3.5.4** (Environmental Consequences) was too focused on the need for  
3 targeted outreach. Conducting major, proactive efforts to ensure meaningful opportunities for  
4 public participation, particularly in low-income and minority communities, is one of the  
5 fundamental elements of project-level environmental justice analysis and would be initiated  
6 early in the planning process for Tier 2 studies. Demographic data and community outreach  
7 strategies would be used to identify specific populations that may be impacted by the project.  
8 They would then analyze the potential impacts to these populations and work with the  
9 communities to identify solutions to minimize or mitigate these impacts. Draft Tier 1 EIS **Section**  
10 **3.5.6** (Future Tier 2 Analysis) describes, in full, all the elements that future Tier 2 environmental  
11 justice analyses would address.

12 Final Tier 1 EIS **Section 3.5.6** clarifies that some of these elements could result in the  
13 identification of additional mitigation strategies during those Tier 2 studies, such as proposing  
14 measures to avoid, minimize, and/or mitigate disproportionately high and adverse effects by  
15 providing offsetting benefits and opportunities to enhance communities and neighborhoods.

16 **Public Comments on Community Impacts in Rural Areas:** Commenters from rural  
17 communities along the Recommended Alternative expressed that they value the quiet, rural  
18 character of their community, and are concerned a highway on a new alignment through their  
19 community would destroy that quiet, rural character. Others focused on concerns the new  
20 highway corridor would bisect their community, separating neighborhoods and community  
21 facilities. Some comments from areas not directly impacted by the Recommended Alternative  
22 requested I-11 be shifted farther away from their community. These concerns were considered  
23 in identifying the Preferred Alternative and are described in more detail in **Chapter 6** (Preferred  
24 Alternative).

25 **Public Comments Providing Additional Data on Community Character and/or**  
26 **Demographics:** Some members of the public expressed a concern the analysis did not identify  
27 the commenters' specific community as low-income and/or minority, noting local government  
28 community development programs or designations. The Tier 1 environmental justice analysis  
29 relied on US Census Bureau data to provide a high-level inventory of community demographics.  
30 Census data aggregate demographics into larger geographies, which can sometimes mask  
31 smaller pockets and neighborhoods of protected populations. As described in **Section 3.5.6**,  
32 Tier 2 study recommendations include development of a more detailed community profile for  
33 potentially impacted communities. When more detailed analyses based on location-specific  
34 impacts are completed during Tier 2 studies, they would use additional data sources and look at  
35 communities and individual neighborhoods in more detail.

36 The Project Team took a more conservative approach in the analysis of minority and low-  
37 income communities intersected by the Recommended and Preferred Alternatives than the  
38 analysis of the Purple, Green, and Orange Alternatives in the Draft Tier 1 EIS. This Final Tier 1  
39 EIS considers communities whose percentages of minority and low-income populations exceed  
40 50 percent or are equal to or greater than county percentages as a potential minority or low-  
41 income population.

42 **Public Engagement during the Draft Tier 1 EIS Study:** FHWA and ADOT have continued to  
43 engage diverse populations in outreach efforts during public review of the Draft Tier 1 EIS.  
44 Communication strategies for this project address the multicultural and bilingual issues and  
45 challenges specific to the Study Area. These strategies were established early in the study

1 process, and include techniques to reduce linguistic, cultural, institutional, geographic, and other  
2 barriers to meaningful participation. Draft Tier 1 EIS **Section 3.5.3.3** (Environmental Justice)  
3 contains more detail regarding the communication strategy and techniques for facilitating  
4 meaningful participation with diverse populations. Public engagement undertaken during the  
5 public review period of the Draft Tier 1 EIS employed these techniques and is described in detail  
6 in **Chapter 5** (Coordination and Outreach) and **Appendix G** (Public Involvement Summary  
7 Report) of this Final Tier 1 EIS. FHWA and ADOT are committed to maintaining government-to-  
8 government relations with Native American tribes for projects that may affect tribal rights and  
9 resources. Tribal coordination continues to be an integral part of this study. More detail on tribal  
10 engagement is contained in **Chapter 5** (Coordination and Outreach) of this Final Tier 1 EIS.

### 11 **3.5.3 No Build Alternative**

12 Under the No Build Alternative, community impacts would include only those related to projects  
13 already planned and programmed. Improvement projects along SR 189 and I-10 in Nogales and  
14 Casa Grande, respectively, have the greatest potential to affect communities with a high  
15 percentage of minority individuals. The beneficial impacts of the Build Corridor Alternatives,  
16 such as improved travel times, reduced congestion, economic development, and improvements  
17 to regional mobility, would not occur.

### 18 **3.5.4 Recommended Alternative**

19 The Recommended Alternative is a hybrid alignment that was based primarily on the Purple and  
20 Green Alternatives. **Table 3.5-1** identifies communities whose boundaries fall within the 2,000-  
21 foot-wide corridor of the Recommended Alternative and notes the percentages of low-income  
22 and minorities in the communities' populations.

23 In the southernmost extents of the Study Area (between Nogales and Sahuarita), the  
24 Recommended Alternative follows existing I-19 and any improvements would likely be limited to  
25 the existing right-of-way. Community impacts in this area would likely be limited to noise and air  
26 quality impacts resulting from additional traffic on I-19 or temporary noise and traffic disruptions  
27 during construction. Most of the communities between Nogales and Sahuarita have populations  
28 that exceed 50 percent minority, making them majority minority communities (i.e., one or more  
29 racial or ethnic minority makes up a majority of the local population). Some of them, including  
30 Nogales and Arivaca Junction, are also potentially low-income. The highest percentages of  
31 people that speak English "less than very well" are in the southernmost extents of the Study  
32 Area, specifically in Nogales.

33 In Sahuarita, the Recommended Alternative extends west from I-19 in a new corridor. Much of  
34 the land within the Recommended Alternative between Sahuarita and Wickenburg is vacant,  
35 with no direct impacts to residential or community facility lands; 64 percent of the 2,000-foot-  
36 wide corridor in Santa Cruz, Pima, and Maricopa Counties is vacant (see **Section 3.3** [Land  
37 Use and Section 6(f)]). Pinal and Yavapai Counties do not maintain existing land use data.

38

1 **Table 3.5-1. Communities in the 2,000-foot-wide Corridor of the Recommended**  
 2 **Alternative**

Geography	Community or Census Designated Places (% minority, % low-income)	Alignment Description
Nogales to Sahuarita	Nogales City CDP ( <b>96%</b> , <b>26%</b> ) Rio Rico CDP ( <b>86%</b> , 13%) Tumacácori-Carmen CDP ( <b>56%</b> , 9%) Tubac CDP (23%, 10%) Amado CDP ( <b>51%</b> , 0%) Arivaca Junction CDP ( <b>70%</b> , <b>27%</b> ) Green Valley CDP (7%, 5%)	Co-located with existing I-19
Sahuarita to Marana	Sahuarita CDP (40%, 5%) Ocotillo Ranches/CT 43.16 (42%, 16%) Three Points CDP (44%, <b>23%</b> ) Sandario Rd near SR 86/CT 44.24 ( <b>47%</b> , <b>24%</b> ) Tucson Estates CDP (37%, 14%) Picture Rocks CDP (21%, 12%) Avra Valley CDP (28%, <b>18%</b> )	New highway on a new alignment
Marana to Casa Grande	Marana CDP (31%, 6%) Red Rock CDP (34%, 12%) Eloy CDP ( <b>81%</b> , <b>27%</b> ) Casa Grande CDP ( <b>50%</b> , <b>15%</b> )	New highway on a new alignment
Casa Grande to Buckeye	Casa Grande CDP ( <b>50%</b> , <b>15%</b> ) Western Pinal County/CT 9414 ( <b>61%</b> , <b>25%</b> ) Goodyear CDP ( <b>42%</b> , 8%) Buckeye CDP ( <b>50%</b> , 12%) Palo Verde/CT 506.04 ( <b>43%</b> , <b>21%</b> ) Tonopah/CT 506.03 ( <b>41%</b> , <b>15%</b> ) Arlington CDP (36%, 14%)	New highway on a new alignment
Buckeye to Wickenburg	Buckeye City CDP ( <b>50%</b> , 12%) Congress CDP (14%, 9%)	New highway on a new alignment

3 SOURCE: US Census Bureau 2010, 2015a, and 2015b.  
 4 CT=census tract; CDP=census designated place; CDPs and CTs listed south to north  
 5 Detailed demographic tables can be found in Draft Tier 1 EIS **Appendix E5** (Demographic Data to Support the Title VI,  
 6 Environmental Justice, and Limited English Proficiency Analysis).  
 7 Bold and underlined percentages exceed 50% or are greater than or equal to county percentages.  
 8

9 The remaining 36 percent of the 2,000-foot-wide corridor in Santa Cruz, Pima, and Maricopa  
 10 Counties is developed and is primarily categorized as commercial, agricultural, recreation/open  
 11 space, or residential land use. Residential land use is present within the 2,000-foot-wide corridor  
 12 of the Recommended Alternative. The degree and severity of community impacts would depend  
 13 on the specific alignment and design of I-11 and the character of the community. Potential  
 14 adverse impacts include right-of-way acquisition, highway traffic noise and air quality impacts,  
 15 and temporary construction-related impacts such as noise, vibration, air quality, and traffic  
 16 delays. Being situated near a new highway can also have beneficial effects, such as improved



1 regional connectivity, job creation, better access to jobs and medical services, and economic  
2 development.

3 **Figure 3.5-1** through **Figure 3.5-3** illustrate minority demographics overlaid with the  
4 Recommended and Preferred Alternatives, and **Figure 3.5-4** through **Figure 3.5-6** illustrate low-  
5 income demographics.

6 **Table 3.5-2** provides an inventory of the acreage of low-income and minority communities within  
7 the 2,000-foot-wide corridors of the Recommended and Preferred Alternatives. As noted in  
8 **Section 3.5.1**, the acreages cited in this table were calculated using a more conservative  
9 approach and flagged several additional communities than were identified in the Draft Tier 1  
10 EIS, including several in Pima County as well as Palo Verde and Tonopah in western Maricopa  
11 County.

12 **Table 3.5-2. Inventory of Acres in Minority and Low-Income Communities in the**  
13 **2,000-foot-wide Corridors of the Recommended and Preferred Alternatives**

Acres		Recommended Alternative (acres)	Preferred Alternative with West Option in Pima County (acres)	Preferred Alternative with East Option in Pima County (acres)
Total Project Acres		75,149	66,956	65,016
Potential Minority and Low-Income Populations	Acres (#)	29,257	15,786	18,790
	Acres (% of total corridor acres)	39%	24%	29%

14 Source: US Census Bureau 2010, 2015a, 2015b, 2017.  
15

16 The Recommended Alternative is not located on tribal land and would not result in direct  
17 impacts to tribal land. It is located approximately 0.3 mile away from the Tohono O’odham  
18 Nation San Xavier District, 0.9 mile from the Garcia Strip of the Schuk Toak District, 0.2 mile  
19 from San Lucy Farms, and 0.6 mile from the Sif Oidak District.

20

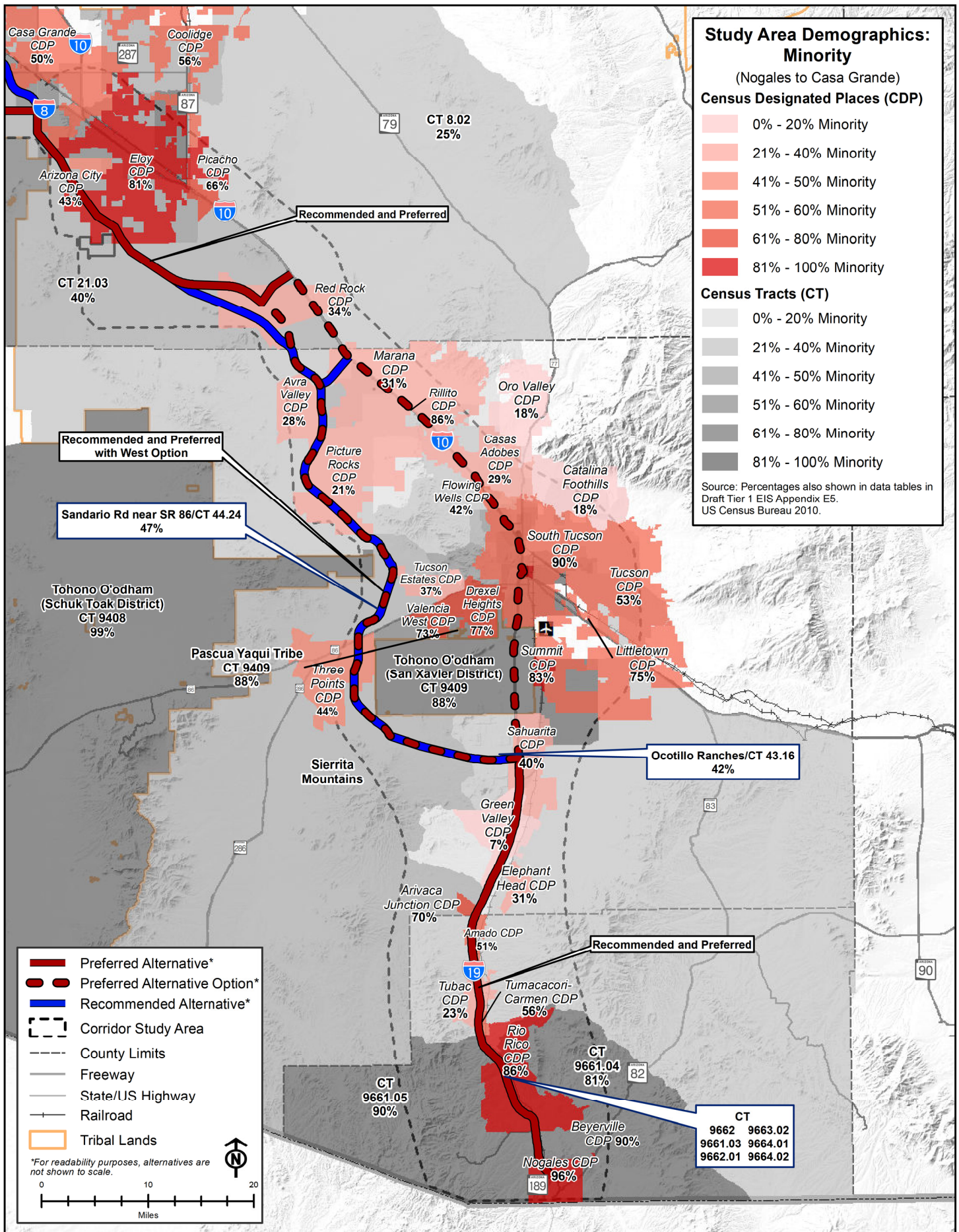


Figure 3.5-1. Minority Demographics: Nogales to Casa Grande

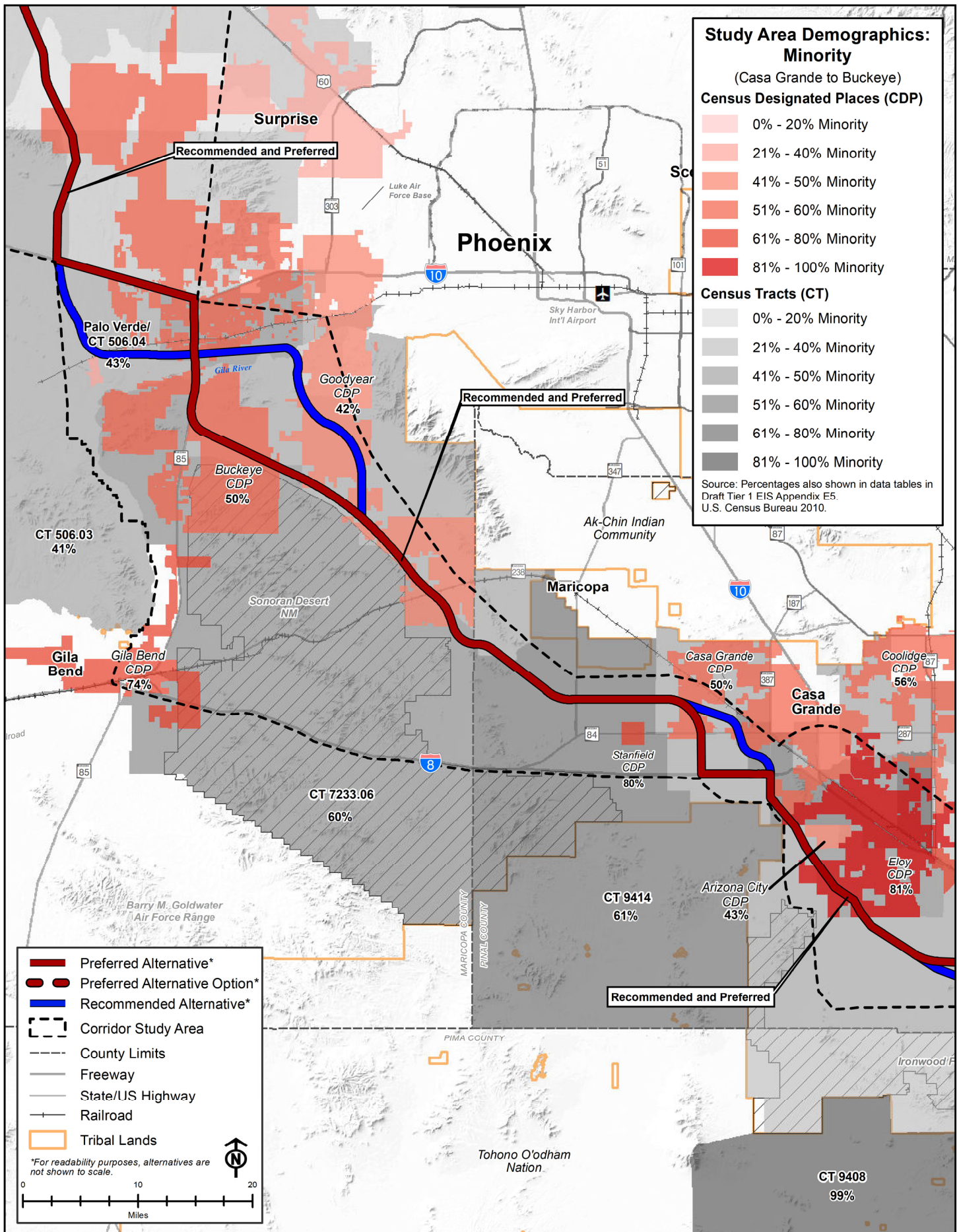


Figure 3.5-2. Minority Demographics: Casa Grande to Buckeye



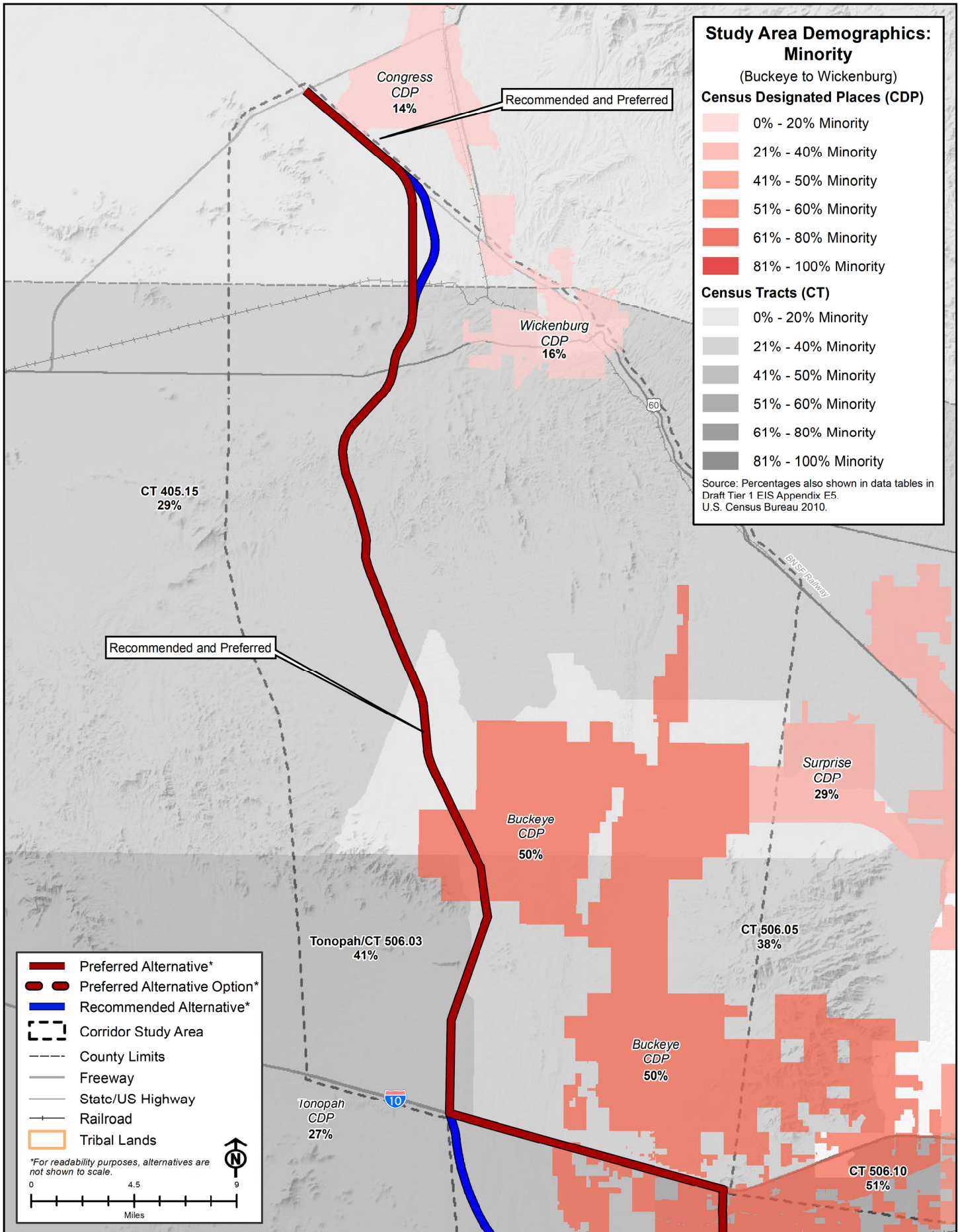


Figure 3.5-3. Minority Demographics: Buckeye to Wickenburg

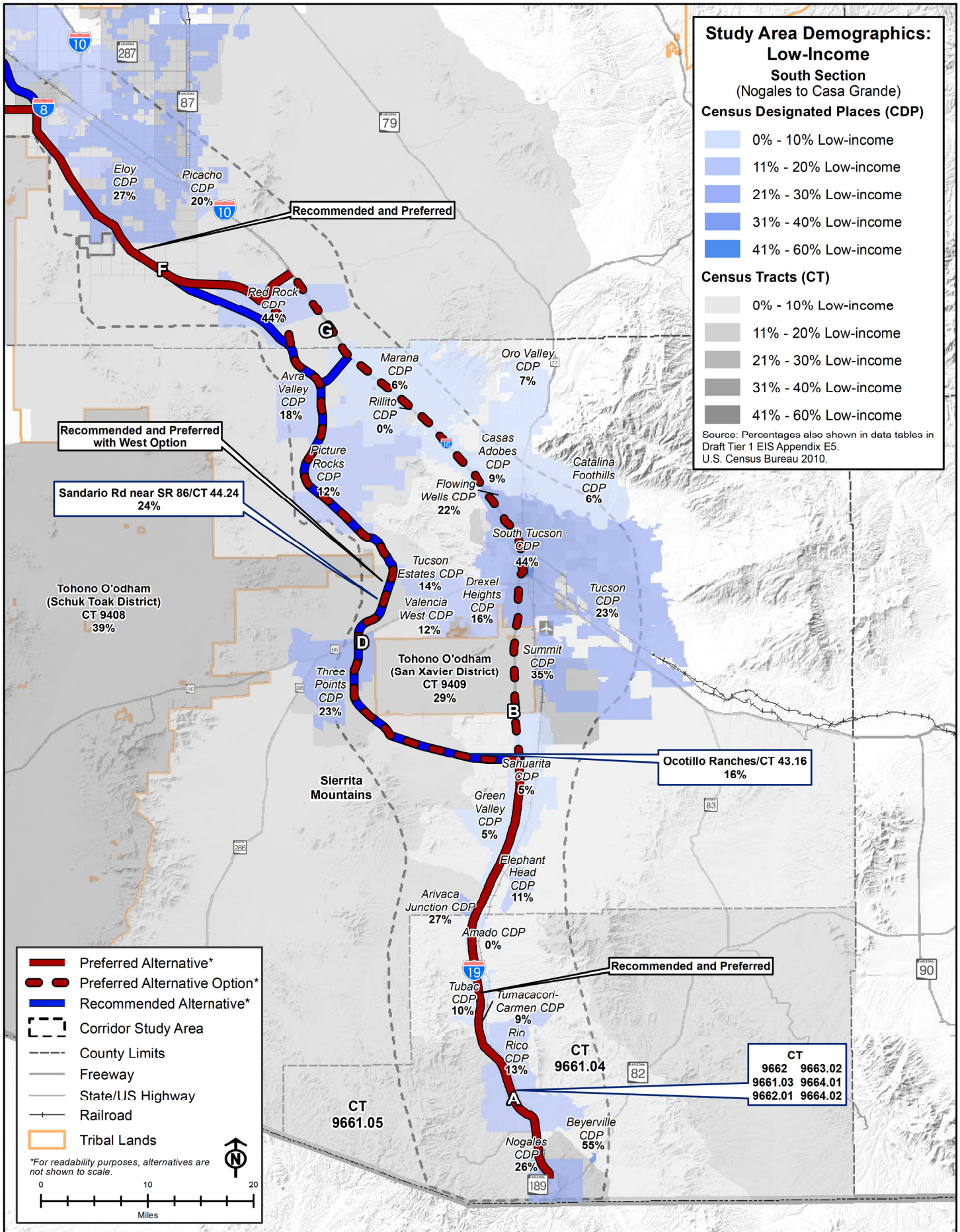


Figure 3.5-4. Low-Income Demographics: Nogales to Casa Grande

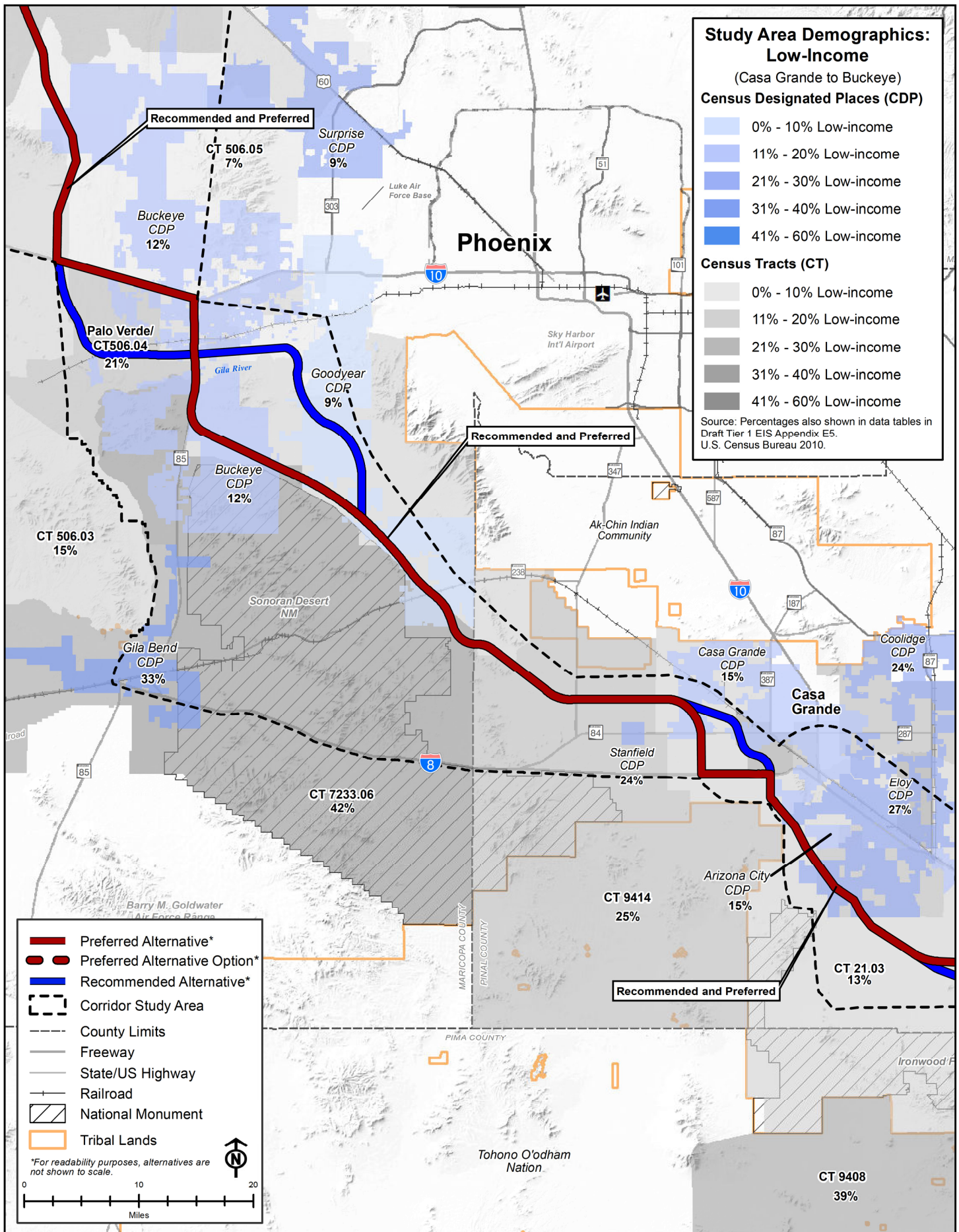
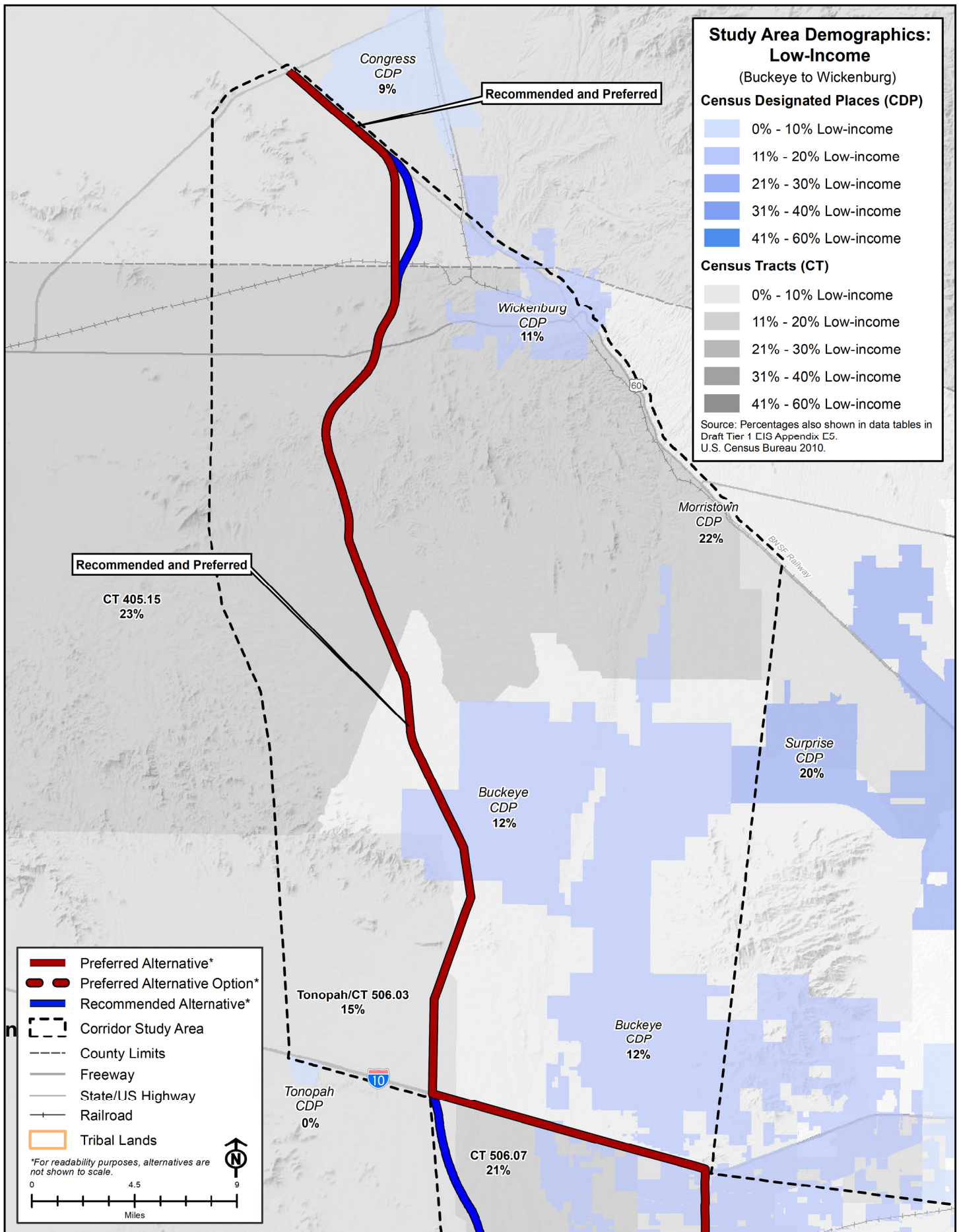


Figure 3.5-5. Low-Income Demographics: Casa Grande to Buckeye



**Figure 3.5-6. Low-Income Demographics: Buckeye to Wickenburg**

1 **3.5.5 Preferred Alternative**

2 **Table 3.5-3** lists communities that are intersected by the Preferred Alternative and the  
 3 percentage of low-income and minority population. The Preferred Alternative follows much of  
 4 the same alignment as the Recommended Alternative with some key differences. Under both  
 5 options, the Preferred Alternative would be co-located with I-19 from Nogales to Sahuarita and  
 6 would experience the same impacts as discussed under the Recommended Alternative  
 7 (**Section 3.5.4**).

8 One of the key differences in the Preferred Alternative is the inclusion of two options through  
 9 Pima County. Under the Preferred Alternative with east option in Pima County, I-11 is co-  
 10 located with I-10. More detailed study and design information is needed to identify the specific  
 11 impacts, but improvement to I-10 has the potential to impact many residences and businesses  
 12 located next to the existing highway right-of-way. Several of the communities along the east  
 13 option exceed 50 percent minority, making them majority-minority communities (including the  
 14 San Xavier District of the Tohono O’odham Nation, South Tucson, Tucson, and Rillito).  
 15 Similarly, both the San Xavier District and South Tucson exceed county percentages for low-  
 16 income by more than 12 and 27 percent, respectively. The demographics of the communities  
 17 along the west option in Pima County contain lower percentages of minority and low-income  
 18 individuals; however, the Recommended Alternative would be a new highway on a new  
 19 alignment through or near those communities. The communities along the west option approach  
 20 or exceed Pima County averages by as much as 6 percent, indicating there could be smaller  
 21 neighborhood pockets of minority and low-income populations.

22 One of the other key differences between the Recommended and Preferred Alternatives is that  
 23 the Preferred Alternative would avoid many impacts to the Buckeye, Goodyear, Palo Verde, and  
 24 Tonopah communities.

25 **Table 3.5-3. Communities in the 2,000-foot-wide Corridor of the Preferred**  
 26 **Alternative**

Geography	Community or Census Designated Places (% minority, % low-income)	Alignment Description
Nogales to Sahuarita	Nogales City CDP ( <b>96%</b> , <b>26%</b> ) Rio Rico CDP ( <b>86%</b> , 13%) Tumacácori-Carmen CDP ( <b>56%</b> , 9%) Tubac CDP (23%, 10%) Amado CDP ( <b>51%</b> , 0%) Arivaca Junction CDP ( <b>70%</b> , <b>27%</b> ) Green Valley CDP (7%, 5%)	Co-located with existing I-19
Sahuarita to Marana: West Option in Pima County	Sahuarita CDP (40%, 5%) Ocotillo Ranches/CT 43.16 (42%, 16%) Three Points CDP (44%, <b>23%</b> ) Sandario Rd near SR 86/CT 44.24 ( <b>47%</b> , <b>24%</b> ) Tucson Estates CDP (37%, 14%) Picture Rocks CDP (21%, 12%) Avra Valley CDP (28%, <b>18%</b> )	New highway on new alignment

Geography	Community or Census Designated Places (% minority, % low-income)	Alignment Description
Sahuarita to Marana: East Option in Pima County	Sahuarita CDP (40%, 5%) Tohono O’odham Nation, San Xavier District (CT 9409: <b>88%</b> , <b>29%</b> ) <sup>a</sup> South Tucson CDP ( <b>90%</b> , <b>44%</b> ) Tucson CDP ( <b>53%</b> , <b>23%</b> ) Flowing Wells ( <b>42%</b> , <b>22%</b> ) Marana CDP (31%, 6%) <sup>a</sup> Casas Adobes CDP (29%, 9%) Rillito CDP ( <b>86%</b> , 0%)	Co-located with existing I-19 and I-10
Marana to Casa Grande	Red Rock CDP (34%, 12%) <sup>a</sup> Eloy CDP ( <b>81%</b> , <b>27%</b> ) Casa Grande CDP ( <b>50%</b> , <b>15%</b> )	New highway on new alignment
Casa Grande to Buckeye	Casa Grande CDP ( <b>50%</b> , <b>15%</b> ) <sup>a</sup> Goodyear CDP ( <b>42%</b> , 8%)	New Highway on new alignment
	Buckeye CDP ( <b>50%</b> , 12%) <sup>a</sup>	Co-located with existing SR 85 and I-10
Buckeye to Wickenburg	Buckeye City CDP ( <b>50%</b> , 12%) Congress CDP (14%, 9%)	New highway on a new alignment

1 SOURCE: US Census Bureau 2010, 2015a, and 2015b.  
 2 CT=census tract; CDP=census designated place; CDPs and CTs listed south to north  
 3 Detailed demographic tables can be found in Draft Tier 1 EIS **Appendix E5** (Demographic Data to Support the Title VI,  
 4 Environmental Justice, and Limited English Proficiency Analysis).  
 5 Bold and underlined percentages are equal to or greater than demographics for the county in which they are located.  
 6 <sup>a</sup> The east option of the Preferred Alternative co-locates with I-19 through the San Xavier District of the Tohono O’odham Nation.

### 3.5.6 Mitigation and Tier 2 Analysis

#### 3.5.6.1 Tier 2 Analysis Commitments

FHWA and ADOT completed a planning-level analysis for this Final Tier 1 EIS to support identification of a 2,000-foot-wide preferred Build Corridor Alternative. Additional analysis in Tier 2 will inform (1) the selection of a specific alignment (approximately 400 feet wide) within the selected 2,000-foot-wide corridor and (2) the selection of the west option or east option in Pima County. Tier 2 analysis will also identify measures to avoid, minimize, or mitigate impacts to community resources and environmental justice populations.

The Tier 2 analysis would be based on more specific corridor alignment information and design features, allowing a more precise evaluation of the impacts related to proposed displacements, relocations, changes to employment and businesses, community characteristics, and housing availability. Additional air quality, noise, and other environmental studies would be conducted to assess the potential human health impacts, both adverse and beneficial, to minority and low-income populations. Specifically, ADOT commits to carrying out the following analysis during the Tier 2 process:

- **T2-Community Resources, Title VI, and Environmental Justice-1:** Develop a Public Involvement Plan consistent with ADOT’s agency-wide Public Involvement Plan (ADOT

1 2017n), which meets federal requirements for Title VI, Environmental Justice, and LEP in  
 2 the transportation decision-making process. The public involvement plan will be developed  
 3 early in the planning process with the focus of ensuring full and fair participation by all  
 4 affected communities and populations. Coordination with local stakeholders and community  
 5 representatives may be needed to understand the unique needs and priorities of those  
 6 affected by the project, as well as determine the most effective means of engaging them in  
 7 the outreach process.

8 • **T2-Community Resources, Title VI, and Environmental Justice-2:** Identify and quantify  
 9 impacts and mitigation measures to address adverse impacts to minority and low-income  
 10 populations. Characterization of the demographics for affected communities would be  
 11 conducted using the most recent census data and supplemental characterization  
 12 techniques. The impact analysis would determine whether there are disproportionately high  
 13 and adverse effects to the minority and/or low-income populations.

14 • **T2-Community Resources, Title VI, and Environmental Justice-3:** Address  
 15 environmental justice in accordance with the principles outlined in EO 12898 and FHWA  
 16 Order 6640.23A (FHWA 2012a). The analysis should include the following items, as  
 17 established by the FHWA “Guidance on Environmental Justice and NEPA” (FHWA 2011a):

18 ○ Conduct major, proactive efforts to ensure meaningful opportunities for public  
 19 participation, including activities to increase participation from low-income and minority  
 20 populations.

21 ○ Compare the project effects (including indirect and cumulative effects) on minority and  
 22 low-income populations with respect to those on the overall population. Fair distribution  
 23 of the beneficial and adverse effects of the Project is the desired outcome.

24 ○ Determine whether the adverse effects are predominantly borne by the minority and low-  
 25 income populations or are appreciably more severe or greater in magnitude on these  
 26 populations than the adverse effects suffered by the non-minority and non-low-income  
 27 populations (i.e., disproportionately high and adverse effects).

28 ○ Determine whether the Project might prevent the denial of, reduction in, or significant  
 29 delay in the receipt of benefits by minority and low-income populations.

30 ○ Determine whether there are practicable mitigation measures or alignment alternatives  
 31 that would avoid or minimize the disproportionately high and adverse effect(s).

32 ○ Determine whether any of the affected communities include minorities, ethnic groups,  
 33 senior populations, persons with disabilities, individuals with a low-income, or those who  
 34 are LEP.

35 **3.5.6.2 Mitigation Commitments**

36 As required by NEPA, FHWA and ADOT considered measures to avoid, minimize, and mitigate  
 37 community resources, Title VI, and Environmental Justice population impacts from the Project  
 38 (generally referred to as mitigation measures) during this Tier 1 process.



1 Communities with minority and low-income populations were identified along the Recommended  
2 and Preferred Alternatives.

3 **3.5.6.3 Additional Mitigation to be Evaluated in Tier 2**

4 During the Tier 2 process, ADOT will evaluate mitigation measures in addition to those listed  
5 above, to include best practices, permit requirements, and/or other mitigation strategies  
6 suggested by agencies or the public. Examples of measures that ADOT may evaluate in Tier 2  
7 include:

- 8 • Avoid community features or resources to the greatest extent practicable.
- 9 • Maintain function and access to existing community facilities.
- 10 • Provide offsetting benefits and opportunities to enhance communities, neighborhoods, and  
11 individuals affected by the project.
- 12 • Build structures such as pedestrian overpasses to maintain existing neighborhood  
13 connections.